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GROUP (USA) LLC

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

**CRYSTAL TEKESTE,  
an individual;**

**Plaintiff,**

VS.

ENCORE GROUP (USA) LLC, a  
Delaware limited liability company;  
and DOES 1 - 50, inclusive,

## Defendants.

Case No. 24-1267

## **DEFENDANT'S NOTICE OF SETTLEMENT**

PLEASE TAKE NOTICE that Defendant, ENCORE GROUPM (USA) LLC, by and through its undersigned counsel, hereby gives notice that it has reached a settlement with Plaintiff, CRYSTAL TEKESTE, in the above-styled cause, and that the Parties anticipate completing the settlement documents within the next thirty days.

1 Dated: June 17, 2024,

2 Respectfully submitted,  
3 **SHANKMAN LEONE**

4 By:/s/ Mitchell L. Fraley

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11 **PROOF OF SERVICE**

12 At the time of service, I was over 18 years of age and not a party to this action. I am  
13 employed in the County of Hillsborough, State of Florida. My business address is 707 N. Franklin  
Street, Fifth Floor, Tampa, California 33602.

14 On June 17, 2024, I served true copies of the following document(s) described as:  
15 **DEFENDANT'S NOTICE OF SETTLEMENT** on the interested parties in this action as follows:

16 Haroon Manjlai  
17 Manjlai Law, PC  
18 9431 Haven Avenue, Suite 100  
Rancho Cucamonga, CA 91730  
Telephone: (951) 268-4384  
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19 Attorneys for Plaintiff CRYSTAL TEKESTE

20

21 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s)  
22 to be sent from e-mail address mfraley@shankmanleone.com to the persons at the e-mail addresses  
23 listed in the Service List. I did not receive, within a reasonable time after the transmission, any  
electronic message or other indication that the transmission was unsuccessful.

24 I declare under penalty of perjury under the laws of State of Florida at the foregoing is true  
and correct.

25 Executed on June 17, 2024, at Tampa, Florida

26

27 *Mitchell Fraley*  
28 Mitchell Fraley